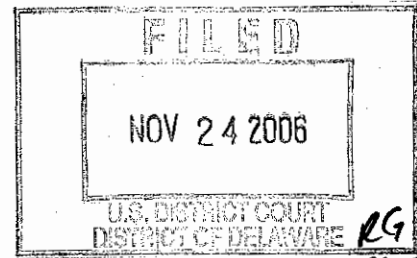


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :
Plaintiff, :
V. : Civil Action No. 05-823 (KAJ)
STANLEY TAYLOR, et al, :
Defendants. :

INTERROGATORIES

TO: Stanley Taylor, et al
Office of the Commissioner
Department of Corrections
245 McKee Road
Dover, DE 19904



COMES NOW THE Plaintiffs, propounds the following Ineterrogatories to the Defendants, Stanley Taylor, Joyce Talley, Anthony Figorua, and Carl Anson, subject to the conditions set forth below:

- a. These Interrogatories are continuing in character, so as to require you to file supplementary answers if you obtain further or different information before trial.
- b. Where the name or identity of a person is requested, please state full name, home address and also business address, if known.
- c. Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the pleadings.
- d. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives and, unless privileged, h attorneys. When answer is made by a corporate Defendant, state the name, address and titled of the person supplying the information, and making the Affidavit, and the source of his/her information
- e. The propoun "you" refers to the party to whom these Interrogatories are addressed, and the persons mentioned in clause (d).

(2)

1. State in your own words the manner in which the incident which forms the subject matter of this Complaint occurred. Include a description of the events which led to the inadequate ventilation and air flow at the Sussex Correctional Institution, Main Kitchen.

2. State the name and addresses of all persons who have personal knowledge of the facts complained of in this action.

3. Name all persons who investigated the facts complained of in this action for you, and give their residence and business address.

4. Name those persons, including the Plaintiffs, who have given you written and/or recorded statements concerning the facts complained of in this action and give their residence and business address. Please attach copies of their written statements to these Answers to Interrogatories.

5. Give the names and addresses of all persons who have any knowledge whatsoever of any of the facts or events which form the subject matter of the Complaint. Specify the subject matter or knowledge which each of the aforesaid witnesses has.

6. Give the name, address and telephone number of each expert the Defendants' propose to call. If a written report has been received from the said expert(s), please attached a copy to your Answers. If no such report has been received, please state the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

7. Give the name and position of any agents, servants or employees of the Department of Corrections' who made or caused to be made any statement, oral or written or otherwise recorded to any individual concerning the incident complained of in the complaint, give the substance of each such statement as well as the circumstances surrounding any such statements.

8. Give the substances of all unwritten policies or procedures of the

(3)

Department of Corrections, regarding the steps to be taken when temperatures at the work place exceeds well-over 100 degrees during the preparation and preparing of meals.


9. State specically and in detail what actions was taken on July 20, 2005, concentering the contaminated hamburgers being served to the prison population. For each person attempting to ascertain this cause, state that person's name, address, date the person to whom they spoke with, the information given, and the action taken.

10. State specifically and in detail whether the SCI Main kitchen was ever approved for the installation of an air condition unit at the work place.

11. State whether the kitchen units at other DOC prisons for the State of Delaware, have or do not, air condition cool kitchen for inmate workers.

DATED:

11/21/06



Jackson
JIM GEORGE BLDG.
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19447

S.M.
RA

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